

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-CR-20104-JEM

UNITED STATES OF AMERICA,

vs.

MARIO PALACIOS PALACIOS.

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**MOTION TO APPOINT SECOND CHAIR COUNSEL**

COMES NOW the Defendant, Mario Palacios Palacios (hereafter “Palacios”), and moves this Honorable Court for the entry of an Order Appointing Second Chair Counsel. In support, thereof Palacios would show:

1. Palacios has been charged by indictment with Conspiracy to Provide Material Support Resulting in Death in violation of Title 18 U.S.C. § 2339A and Conspiracy to Kill or Kidnap outside the United States in violation of 18 U.S.C. § 956(a)(1).
2. Undersigned was appointed under the Criminal Justice Act to represent Palacios in January 4, 2022 at his initial appearance.
3. At his initial appearance, Palacios agreed to have his arraignment set for January 31, 2022.
4. Palacios was arraigned on April 4, 2022.
5. On July 14, 2022, Palacios was then arraigned on a superseding indictment.
6. The Government filed their response to the standing discovery order on August 3, 2022.
7. This case deals with the assassination of the Haitian President which occurred in Port-au-Prince, Haiti in July of 2021.
8. There are approximately over 20 witnesses currently incarcerated in Port-au-Prince, Haiti.
9. There are also additional witnesses located in Bogota, Colombia and Jamaica.

10. This case is a complex international case where the President of a country was assassinated. The main facts and circumstances occurred outside of the jurisdiction and most of the witnesses are in other countries.

11. Additionally, the Government moved to designate a classified information security officer pursuant to Section 9 of the Classified Information Procedures Act (CIPA).

11. All these circumstances require significant amounts of travel, filing of extensive pretrial motions, review of extensive amounts of discovery and preparation for trial.

12. As a whole this case is extended and complex and in the interest of justice a second chair CJA attorney is appropriate.

13. Undersigned has discussed this motion with CJA attorney Richard C. Klugh who is willing to act as second chair counsel.

WHEREFORE, Palacios would request this Honorable Court to appoint Richard C. Klugh as second chair counsel under the Criminal Justice Act.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 17, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all parties.

/s/Alfredo A. Izaguirre  
Alfredo A. Izaguirre, Esq.